

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANDREA VITI, Individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SHATTUCK LABS, INC., TAYLOR
SCHREIBER, ANDREW NEILL, JOSIAH
HORNBLLOWER, HELEN M. BOUDREAU,
NEIL GIBSON, GEORGE GOLUMBESKI,
MICHAEL LEE, TYLER BROUS, VICTOR
STONE, CITIGROUP GLOBAL MARKETS
INC., COWEN AND COMPANY, LLC,
EVERCORE GROUP L.L.C., AND
NEEDHAM AND COMPANY, LLC,

Defendants.

Case No. 1:22-cv-00560-CBA-RML

NOTICE OF MOTION OF PETER
AAMOTH FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF LEAD COUNSEL

PETER AAMOTH, individually and on behalf of
all others similarly situated,

Plaintiff

v.

SHATTUCK LABS, INC., TAYLOR
SCHREIBER, ANDREW NEILL, JOSIAH
HORNBLLOWER, HELEN M. BOUDREAU,
NEIL GIBSON, GEORGE GOLUMBESKI,
MICHAEL LEE, TYLER BROUS, and
VICTOR STONE,

Defendants.

Case No. 1:22-cv-00795-CBA-RML

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Peter Aamoth (“Aamoth”), by and through his counsel, will and does hereby move this Court, pursuant to Section 27(a)(3) of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3), and Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, and Federal Rule of Civil Procedure 42, for an Order: (1) consolidating the above-captioned related actions (the “Related Actions”); (2) appointing Aamoth as Lead Plaintiff on behalf of a class consisting of all persons and entities other than defendants in the Related Actions that purchased or otherwise acquired (a) Shattuck Labs, Inc. (“Shattuck” or the “Company”) securities pursuant and/or traceable to the registration statement and related prospectus issued in connection with the Company’s October 2020 initial public offering, or (b) Shattuck securities between October 9, 2020 and November 9, 2021, both dates inclusive; and (3) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class.

Aamoth is aware of Rule 3.A of this Court’s Individual Motion Practices and Rules, which states, in relevant part, “[a] pre-motion conference with the Court is required before making any motions, except: when one or more of the parties is pro se; when the case is a habeas corpus petition, a prisoner petition, a social security appeal, or bankruptcy appeal; when it is a motion for a temporary restraining order or preliminary injunction; or, upon notice to the Court, when waiting to file a motion could result in the loss of a right.” Here, pursuant to the PSLRA, the deadline to file a motion for appointment as Lead Plaintiff in the Related Actions is April 1, 2022, on which date any member of the putative Class may so move. See 15 U.S.C. §§ 77z-1(a)(3)(A)(i)(II) & (a)(3)(B)(i); 78u-4(a)(3)(A)(i)(II) & (a)(3)(B)(i). Aamoth will thus not know the identities of the other putative Class members who intend to file competing Lead Plaintiff

motions until April 2, 2022—the day after the statutory deadline—making conferral with opposing counsel prior to the filing of Aamoth’s motion papers impracticable. Under these circumstances, Aamoth respectfully requests that compliance with Rule 3.A of this Court’s Individual Motion Practices and Rules be waived in this instance.

Dated: April 1, 2022

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

J. Alexander Hood II

Thomas H. Przybylowski

600 Third Avenue, 20th Floor

New York, NY 10016

Telephone: (212) 661-1100

Facsimile: (212) 661-8665

jalieberman@pomlaw.com

ahood@pomlaw.com

tprzybylowski@pomlaw.com

*Counsel for Lead Plaintiff Movant Peter Aamoth
and Proposed Lead Counsel for the Class*